

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

15-cv-07433-LAP

GHISLAINE MAXWELL,

Defendant.

**Declaration of Laura A. Menninger in Support of Ms. Maxwell's
Objections to Unsealing Sealed Materials Related to
Docket Entries 231, 279, 315, 320, & 335**

I, Laura A. Menninger, declare as follows:

1. I am an attorney at law duly licensed in the State of New York and admitted to practice in the United States District Court for the Southern District of New York. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell ("Maxwell") in this action. I respectfully submit this declaration in support of Ms. Maxwell's Objections to Unsealing Sealed Materials Related to Docket Entries 231, 279, 315, 320, & 335.

2. Attached as Exhibit A is a summary chart of Ms. Maxwell's Position on Docket Entries 231, 279, 315, 320, & 335.

3. Attached as Exhibit B are true and correct copies of DE 283 at 192-202, Case No. 18-2869 (2d Cir. Aug. 9, 2019).

4. Attached as Exhibit C is a list of Google results of internet news stories regarding Ms. Maxwell October 20, 2020.

5. Conventionally submitted as Exhibit D (filed under seal) is a true and correct copy of the [REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2020.

By: /s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on November 12, 2020, I electronically served this *Declaration of Laura A. Menninger in support of Ms. Maxwell's Objections to Unsealing Sealed Materials Related to Docket Entries 231, 279, 315, 320, & 335* via ECF on the following:

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/s/ Nicole Simmons

Nicole Simmons

EXHIBIT A

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

DOCKET #	DATE FILED	DEFENDANT'S POSITION	COUNTERVAILING INTERESTS¹
231	6.20.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	C1-1 C1-2 C1-3 C1-4
232	6.20.16	Redact all Non-Party witness names and identifying information.	C1-1 C1-2 C1-3 C1-4
232-7	6.20.16	Redact all Non-Party witness names and identifying information.	C1-1 C1-2 C1-3 C1-4
232-8	6.20.16	Keep sealed – Non-Party reliance on Protective Order	C1-1 C1-2 C1-3 C1-4
232-9	6.20.16	No objection to unsealing	
232-10	6.20.16	No objection to unsealing	
232-11	6.20.16	No objection to unsealing	

¹ Key:

CI-1 - Reasonable reliance the Protective Order by a party or non-party.

CI-2 - Prevention of the abuse of court records and files.

CI-3 - Annoyance, embarrassment, oppression, undue burden (“Privacy Interests”).

CI-4 - Preserving the fundamental rights of suspects or others under criminal investigation – including due process right to a fair trial and impartial jury unimpaired by excessive publicity, release of potentially inadmissible evidence for the Criminal Action, or improper revelation of a potential witness or their potential testimony.

CI-5 - Improper submission of documents thereby weaponizing judicial documents.

CI-6 - Untrustworthy, unreliable, and incorrect information.

CI-7 - Non-Judicial Documents.

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

255	6.28.16	No objection to unsealing	
257	6.28.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-2² CI-3 CI-4 CI-5 CI-6 CI-7
258	6.28.16	Keep sealed – Non-Party reliance on Protective Order	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
258-1	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
258-2	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6

² Ms. Maxwell notes that Response Brief is filled with irrelevant information and misleading deposition excerpts that are wholly irrelevant to the underlying motion for sanctions for failure to comply with discovery obligations relating to plaintiff's medical information. These arguments were made, and documents filed, for purposes of distraction and harassment, and have nothing to do with the issues presented by the motion. This is classic abuse of the courts records and files. The Response and Exhibits were not referenced in the Order, and the exhibits are not properly considered judicial documents.

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

			CI-7
258-3	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
258-4	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
258-5	6.28.16	No objection to unsealing	
258-6	6.28.16	No objection to unsealing	
258-7	6.28.16	No objection to unsealing	
258-8	6.28.16	No objection to unsealing	
258-9	6.28.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
258-10	6.28.16	No objection to unsealing	
261	7.1.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

269	7.8.16	No objection to unsealing	
270	7.8.16	No objection to unsealing	
270-1	7.8.16	No objection to unsealing	
270-2	7.8.16	Redact all Non-Party witness names and identifying information.	CI-1 CI-2 CI-3
270-3	7.8.16	No objection to unsealing	
270-4	7.8.16	No objection to unsealing	
270-6	7.8.16	No objection to unsealing	
272-1	7.12.16	Keep Sealed	CI-6 CI-7
272-2	7.12.16	No objection to unsealing	
272-3	7.12.16	No objection to unsealing	

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

272-4	7.12.16	No objection to unsealing	
272-5	7.12.16	Already publicly filed (DE 45)	
272-6	7.12.16	Already publicly filed (DE 31)	
272-7	7.12.16	Keep sealed (Already released?)	CI-2 CI-3 CI-4 CI-5
272-8	7.12.16	No objection to unsealing	
272-9	7.12.16	No objection to unsealing	
272-10	7.12.16	Redact all Non-Party witness names and identifying information.	CI-1 CI-2 CI-3
303	7.25.16	No objection to unsealing	
304	7.25.16	No objection to unsealing	

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

304-1	7.25.16	No objection to unsealing	
304-2	7.25.16	No objection to unsealing	
304-3	7.25.16	No objection to unsealing	
304-4	7.25.16	No objection to unsealing	
313	7.29.16	Already publicly filed	
313-1	7.29.16	No objection to unsealing	
279	7.13.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4
280	7.13.16	Redact all quotes from Ms. Maxwell and Non-Party deposition testimony, Non-Party identifying information, and argument of counsel violative of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

280-1	7.13.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
280-2	7.13.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-6
288	7.15.16	Not sealed	
288-1	7.15.16	Not sealed	
288-2	7.15.16	Not sealed.	

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

289	7.18.16	Not sealed	
290	7.18.16	Redact identifying information and email address.	CI-1 CI-2 CI-3
291	7.18.16	Not sealed	
291-1	7.18.16	No position. Not sealed at 188-1	
291-2	7.18.16	Keep sealed	CI-2 CI-3 CI-4 CI-7

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

291-3	7.18.16	Keep sealed	CI-2 CI-3 CI-4 CI-7
300	7.22.16	Not sealed	
300-1:2	7.22.16	Not sealed	
337	8.8.16	Not sealed	
338	8.8.16	Keep sealed	CI-1 CI-3 CI-4 CI-6

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

338-2	8.8.16	Keep sealed	CI-7
338-3	8.8.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
338-4	8.8.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-7
338-5	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
338-6	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

338-7	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
338-8	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
338-9	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
338-10	8.8.16	No objection to unsealing	
353	8.10.16	Redact all Non-Party witness names and identifying information	CI-1 CI-3

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

375	8.17.16	Not sealed	
315	7.29.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
316	7.29.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
316-1	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
316-2	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

316-3	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
316-4	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
316-5	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
316-6	7.29.16	Keep sealed	CI-1
316-7	7.29.16	Keep sealed –Reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

316-8	7.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
339	8.8.16	Keep sealed	CI-1 CI-2 CI-3 CI-4
340	8.8.16	Keep sealed	CI-1 CI-4
340-1	8.8.16	Keep sealed	CI-1 CI-4
340-3	8.8.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

340-4		Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
340-5		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
340-6		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
340-7		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
340-8		Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

340-9	8.8.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
368	8.12.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
369	8.12.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
369-1	8.12.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-2	8.12.16	Keep sealed	CI-1

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

369-3	8.12.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
369-4	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-5	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-6	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-7	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

369-8	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-9	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-10	8.12.16	Keep sealed	CI-2 CI-6 CI-7
369-11	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-12	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

369-13	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-14	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-15	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
369-16	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
320	8.1.16	Keep Sealed	CI-1 CI-3

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

321	8.1.16	Not sealed	
321-1	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
321-2	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
321-3	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
321-4	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

321-5	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
321-6	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
322	8.1.16	Not sealed	
323	8.1.16	Redact all names and identifying information for Ms. Maxwell and Non-Parties	CI-1 CI-2 CI-3 CI-4 CI-6
329	8.2.16	Not Sealed	

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

335	8.8.16	No objection to unsealing.	
336	8.8.16	No objection to unsealing.	
336-1	8.8.16	No objection to unsealing.	
336-2	8.8.16	No objection to unsealing.	
336-3	8.8.16	No objection to unsealing	

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

380	8.18.16	No objection to unsealing.	
381	8.18.16	No objection to unsealing.	
381-1	8.8.16	No objection to unsealing.	
381-2	8.8.16	No objection to unsealing.	
381-3	8.8.16	No objection to unsealing.	

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

381-4	8.8.16	No objection to unsealing – Redacted version released by Second Circuit	
381-5	8.8.16	No objection to unsealing – Redacted version released by Second Circuit	
381-6	8.8.16	No objection to unsealing	
381-7	8.8.16	No objection to unsealing – Redacted version released by Second Circuit	
381-8	8.8.16	No objection to unsealing	

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

392	8.23.16	Keep Sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
393	8.23.16	Keep Sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-6
393-1	8.23.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
393-2	8.23.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
393-3	8.23.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-7

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

393-4	8.23.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5 CI-7
400	8.25.16	Keep Sealed	CI-1 CI-2 CI-3 CI-4
401	8.25.16	Keep Sealed	CI-1 CI-2 CI-3 CI-4
401-1	8.25.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5
401-2	8.25.16	Keep sealed	CI-1 CI-2 CI-3 CI-4 CI-5

Defendant's Position on Docket Entries 231, 279, 315, 320, & 335

401-3	8.25.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
401-4	8.25.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
401-5	8.25.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7
401-6	8.25.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2 CI-3 CI-4 CI-5 CI-6 CI-7

EXHIBIT B

Confidential

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

VIRGINIA L. GIUFFRE,

Plaintiff,

-against-

Case No.:
15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- - - - - x

* * CONFIDENTIAL * *

Continued Videotaped Deposition of GHISLAINE MAXWELL, the Defendant herein, taken pursuant to subpoena, was held at the law offices of Boies, Schiller & Flexner, LLP, 575 Lexington Avenue, New York, New York, commencing July 22, 2016, 9:04 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

- - -

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1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221

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2 thought. I really don't recall her, so it's
3 hard for me to testify what I thought about
4 her age at the time.

5 Q. Was Virginia, in the period of
6 around 2000, the youngest person that, as you
7 understood it, was giving Mr. Epstein
8 massages?

9 MR. PAGLIUCA: Object to the form
10 and foundation.

11 A. Again, I can't testify to her age,
12 but everybody else that I can recall seemed
13 to be again, like I would say, adults.

14 Q. You didn't think Virginia was an
15 adult, did you?

16 MR. PAGLIUCA: Object to the form
17 and foundation.

18 A. Like I said, I don't recall her. I
19 don't recall thinking about -- my memory is
20 of adults giving Jeffrey massages, and as I
21 don't really remember Virginia around that
22 time, I don't know what I think.

23 Q. You do remember Virginia, about
24 that time back in the 2000s, giving
25 Mr. Epstein massages?

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2 MR. PAGLIUCA: Object to the form
3 and foundation.

4 A. I barely remember her at all.

5 Q. Whether you barely remember her or
6 not, you do remember that back in the period
7 around 2000, Virginia was giving Mr. Epstein
8 massages, right?

9 MR. PAGLIUCA: Objection to form
10 and foundation.

11 A. Only in the most general terms. It
12 would be somebody who would give him a
13 massage, and that's it.

14 Q. During the period of time back in
15 the period around 2000, when you knew that
16 Virginia was somebody who would give
17 Mr. Epstein a massage, was she somebody who
18 you considered an adult?

19 MR. PAGLIUCA: Objection to form
20 and foundation.

21 A. I didn't consider her at all
22 because she is not somebody that I really
23 interacted with.

24 Q. It is your testimony that Virginia
25 was not somebody that you interacted with, is

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1 G. Maxwell - Confidential

2 Epstein's home in Palm Beach?

3 MR. PAGLIUCA: Objection to form
4 and foundation.

5 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 Q. [REDACTED]

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1 G. Maxwell - Confidential

2 Q. [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

5 A. [REDACTED]

[REDACTED]

7 A. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 Q. [REDACTED]

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2 MR. PAGLIUCA: Objection to form
3 and foundation.

4 A. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

8 MR. PAGLIUCA: Objection to form
9 and foundation.

10 A. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

14 Q. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

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1 G. Maxwell - Confidential

2 Q. [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

7 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 [REDACTED]

21 MR. PAGLIUCA: Objection to form

22 and foundation.

23 [REDACTED] [REDACTED]

24 [REDACTED]

[REDACTED]

Confidential

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1 G. Maxwell - Confidential

2 and foundation.

3 A. No.

4 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 MR. PAGLIUCA: Objection to form

9 and foundation.

10 A. I don't know.

11 [REDACTED]

17 MR. PAGLIUCA: Objection to form

18 and foundation. Asked and answered.

19 A. No.

20 Q. Were they ever in the Virgin

21 Islands?

22 MR. PAGLIUCA: Objection to form

23 and foundation.

24 A. No.

25 [REDACTED]

Confidential

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1

8

17

23

24

25

MR. PAGLIUCA: Objection to form

and foundation.

Confidential

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1 G. Maxwell - Confidential

2 it to something in the case.

3 MR. BOIES: I think it's tied, but

4 if you instruct her not to answer, it
5 goes into the --

6 MR. PAGLIUCA: Meat grinder.

7 BY MR. BOIES:

8 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 A. Can you repeat the question?

15 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 MR. PAGLIUCA: Same objection.

21 A. No.

22 Q. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Confidential

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1

2 CERTIFICATE

3

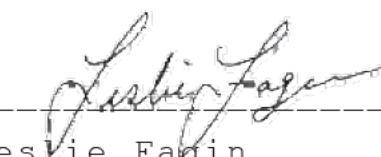
4

5 I HEREBY CERTIFY that GHISLAINE
6 MAXWELL, was duly sworn by me and that the
7 deposition is a true record of the testimony
8 given by the witness.

9

10

11


Leslie Fagin,



12 Registered Professional Reporter

13 Dated: July 22, 2016

14

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(The foregoing certification of
this transcript does not apply to any
reproduction of the same by any means, unless
under the direct control and/or supervision
of the certifying reporter.)

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**EXHIBIT D
CONVENTIONALLY SUBMITTED
FILED UNDER SEAL**